

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

CHINESE PROGRESSIVE ASSOCIATION,  
CHINATOWN RESIDENT ASSOCIATION,  
CITY LIFE / VIDA URBANA, SIU TSANG,  
FUNG YUNG, YAN HUI, MARIA ALTRECHE,

Proposed Plaintiff-Intervenors

v.

CITY OF BOSTON, MASSACHUSETTS; THOMAS M.  
MENINO, in his official capacity as  
Mayor of the City of Boston;  
BOSTON CITY COUNCIL: MICHAEL F.  
FLAHERTY, PAUL J. SCAPICCHIO, JAMES M.  
KELLY, MAUREEN E. FEENEY, CHARLES C.  
YANCEY, ROB CONSALVO, JOHN TOBIN, CHUCK  
TURNER, MICHAEL P. ROSS, JERRY P.  
MCDERMOTT, FELIX D. ARROYO, MAURA  
HENNIGAN, STEPHEN J. MURPHY; BOSTON  
ELECTION DEPARTMENT; GERALDINE CUDDYER,  
in her official capacity as Chair of  
the Boston Election Department,

Defendants.

CIVIL ACTION No.  
05-11598WGY

DECLARATION

THREE-JUDGE COURT  
WGY, PS, SL

**DECLARATION OF SIU TSANG**

I, Siu Tsang, declare under penalty of perjury that the following is true and correct:

1. I was born in 1930 in Shenzhen, China. I have been in the United States since 1981 and became a United States citizen in 2000. I am a registered voter and currently reside in the City of Boston at 80 Mason Street, Apt. #314, Boston, Massachusetts, 02111.

2. I am limited English proficient. I cannot read English. I seek to intervene in this

action as a plaintiff to protect my right to participate in the electoral process equally with other citizens and to preserve my rights under the Voting Rights Act of 1965.

3. In the September 2003 preliminary election, a poll worker stood by my side and watched me as I voted after I told him I did not need help voting.

4. The poll worker pressured me to vote for additional candidates.

5. The poll worker tried to help me put my ballot in the ballot box after I told him I did not need help voting.

6. If the ballots were translated into Chinese, I could and would vote in more of the races.

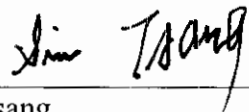
7. I desire to have the Voting Rights Act of 1965 fully and faithfully enforced.

8. I plan to vote in future elections. I believe that my rights under the Voting Rights Act of 1965 may be violated if the current barriers in voting are not corrected.

9. I am a member of the Chinese Progressive Association. I am a steering committee member and member of the Chinatown Resident Association.

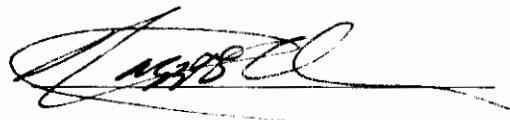
I declare under the penalty of perjury and pursuant to Title 28 of the United States Code, Section 1746, that the foregoing is true and correct to the best of my knowledge, recollection, and belief. I have reviewed this declaration with Karen Chen of Chinese Progressive Association, who translated it into Chinese, and believe it accurately reflects my statements and experience.

Dated: 9/1/2005

  
\_\_\_\_\_  
Siu Tsang

I, Karen Chen, certify under penalty of perjury that I am fluent in both Chinese and English and that I have correctly and accurately translated this document from English to Chinese and that Siu Tsang has assured me that he understands this document.

Dated: 9/1/2005

  
\_\_\_\_\_